

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

Robert Manchel, Esquire
1 Eves Drive, Suite 111
Marlton, NJ 08053-3125
Attorney for Debtor
RM-1141

In Re:

Betina C. Finch

Case No. 12-37273CMG

Judge: Christine M Gravelle

Chapter 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO

CREDITOR'S MOTION or CERTIFICATION OF DEFAULT

X TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT

The debtor in the above-captioned chapter 13 proceeding hereby objects to the following **(choose one)**:

1. _____ Motion for Relief from the Automatic Stay filed by _____, creditor. A hearing has been scheduled for _____, at 9:00 a.m.

OR

_____ Motion to Dismiss filed by the Standing Chapter 13 Trustee. A hearing has been scheduled for _____ at _____ a.m.

OR

_____ Certification of Default filed by _____, creditor. I am requesting that a hearing be scheduled on this matter.

OR

 X Certification of Default filed by Standing Chapter 13 Trustee. I am requesting that a hearing be scheduled on this matter.

2. I am objecting to the above for the following reasons (**choose one**):

_____ Payments have been made in the amount of \$_____, but have not been accounted for. Documentation in support is attached hereto.

OR

_____ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

OR

X Other: The arrears figures on the trustee's certification are inaccurate. The July 21, 2017 court order confirming my plan reflects monthly payments of \$1,449.00, commencing on August 1, 2017. Thereafter, the court's July 31, 2017 order granting attorney's supplemental fees, reflects a monthly payment of \$1,642.00, commencing in August of 2017. The total amount of my arrears is \$4,926.00. I respectfully request that the trustee's motion be dismissed and allow me to cure the arrears and continue with my bankruptcy case.

3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.
4. I certify under penalty of perjury that the foregoing is true and correct.

Date: 10/16/17

/s/ Betina C. Finch
Betina C. Finch, Debtor